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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **-and-**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

18 — Affects PG&E Corporation
19 — Affects Pacific Gas and Electric
Company
20 X Affects both Debtors

21 *All papers shall be filed in the Lead
22 Case, No. 19-30088 (DM)

Chapter 11

Case No.: 19-30088
(Lead Case)
(Jointly Administered)

**XL SPECIALTY INSURANCE
COMPANY'S JOINDER WITH: (A)
LIMITED OBJECTION OF THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO PLAN
CONFIRMATION [DKT. 7300]; AND
(B) SOUTH SAN JOAQUIN
IRRIGATION DISTRICT'S (A)
OBJECTION TO DEBTORS' AND
SHAREHOLDER PROPOSALS'
JOINT CHAPTER 11 PLAN OF
REORGANIZATION DATED MARCH
16, 2020 AS AMENDED AND (B)
OBJECTION TO CURE AMOUNTS
AND OTHER MATTERS PERTAINING
TO ASSUMPTION PURSUANT TO
SECTION 365(B)(1) OF THE
BANKRUPTCY [DKT. 7037]**

26 Date: May 27, 2020

27 Time: 10:00 a.m. (PST)

1 Place: United States Bankruptcy Court
2 Courtroom 17, 16th Floor
3 San Francisco, CA 94102
4 Judge: The Hon. Dennis Montali

5 XL Specialty Insurance Company (“XL Specialty”), by and through its
6 undersigned counsel, hereby joins with the arguments made in: (1) the Limited Objection
7 of the Official Committee of Unsecured Creditors to Plan Confirmation [Dkt. 7300] (the
8 “UCC Limited Objection”) as concerns: (a) Section 10.3 in the Plan,¹ (b) Paragraph 13
9 in the Plan Supplement and (c) other arguments made as concerns General Unsecured
10 Claims (Classes 4A and 4B, which XL Specialty is so classified); and (2) South San
11 Joaquin Irrigation District’s (A) Objection to Debtors’ and Shareholder Proponents’ Joint
12 Chapter 11 Plan of Reorganization Dated March 16, 2020 As Amended and (B)
13 Objection to Cure Amounts and Other Matters Pertaining to Assumption Pursuant to
14 Section 365(b)(1) of the Bankruptcy Code [Dkt. 7265] (the “Irrigation District’s
15 Objection”) as concerns General Unsecured Creditors and the standards concerning
16 assumption of executory contracts, which were listed in Section II(C) (list of
17 “Objectionable Plan Provisions”) and discussed in Section IV therein.

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25 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the
26 UCC Limited Objection and in XL Specialty’s Objection to: (A) Debtors’ and Shareholder
27 Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020; and (B) Schedule of
Executive Contracts to be Assumed Pursuant to the Plan and Proposed Cure Amounts [Dkt.
7193], which is incorporated herein by this reference.

CONCLUSION

WHEREFORE, XL Specialty respectfully requests entry of an order granting: (i) this Joinder; and (ii) such other and further relief as is just and proper.

Executed this 18th day of May, 2020.

SMTD Law LLP

By /s/Robert J. Berens

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

Chapter 11

PG&E CORPORATION,

Case No.: 19-30088

(Lead Case)

(Jointly Administered)

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

CERTIFICATE OF SERVICE

Debtors.

Date: May 27, 2020
Time: 10:00 a.m. (PST)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
Judge: The Hon. Dennis Montali

— Affects PG&E Corporation
— Affects Pacific Gas and Electric Company
X Affects both Debtors

*All papers shall be filed in the Lead Case, No.
19-30088 (DM)

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is: SMTD Law LLP, 17901 Von Karman Avenue, Suite 500, Irvine, California 92614. On May 18, 2020, I served the within document, **XL SPECIALTY INSURANCE COMPANY'S JOINDER WITH: (A) LIMITED OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO PLAN CONFIRMATION [DKT. 7300]; AND (B) SOUTH SAN JOAQUIN IRRIGATION DISTRICT'S (A) OBJECTION TO DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED MARCH 16, 2020 AS AMENDED AND (B) OBJECTION TO CURE AMOUNTS AND OTHER MATTERS PERTAINING TO ASSUMPTION PURSUANT TO SECTION 365(B)(1) OF THE BANKRUPTCY [DKT. 7037]**, on the interested party(s), listed below, follows:

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- FACSIMILE.** By transmitting via facsimile the document(s) listed above to the fax number(s) set forth on the attached Telecommunications Cover Page(s) on this date before 5:00 p.m.
- U.S. MAIL.** By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below in Exhibit "A". I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- PERSONAL SERVICE.** By causing document(s) listed above to be personally delivered the person(s) at the address(es) set forth below.
- OVERNIGHT COURIER.** By placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below.
- ELECTRONIC.** By electronically transmitting the document(s) listed above to the electronic notification address(es) of the addressee(s) listed below in Exhibit "A".

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 18, 2020, at Irvine, California.

/s/Rachel Brown

Rachel Brown

Exhibit "A"

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